

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. <sup>1</sup>	:	
	:	
	X	

**INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS REGARDING JUNE 3-4, 2020 HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (the “Committee”)<sup>2</sup> hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for June 3-4, 2020 Omnibus Hearing* [Case No. 17-3283, Docket No. 13220] (the “Scheduling Order”) and respectfully states as follows:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

1. Luc A. Despins and Zachary S. Zwillinger of Paul Hastings LLP will appear telephonically on behalf of the Committee at the Hearing (as defined in the Scheduling Order), and address, as necessary, the following matters:

- (a) Status Report to be filed by the Oversight Board;
- (a) Status Report to be filed from AAFAF;
- (b) *Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company for Relief from the Automatic Stay, or, in the Alternative, Adequate Protection.* [Case No. 17-3567, Docket No. 673];<sup>3</sup>
  - (i) *Partial Joinder of Official Committee of Unsecured Creditors in Support of Opposition of Financial Oversight and Management Board for Puerto Rico to Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, and Financial Guarantee Insurance Company for Relief from Automatic Stay or, in the Alternative, Adequate Protection* [ECF No. 673] [Case No. 17-3567, Docket No. 681];
  - (ii) *Limited Joinder of Official Committee of Unsecured Creditors in Support of Sur-Reply of Financial Oversight and Management Board for Puerto Rico in Opposition to Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, and Financial Guaranty*

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<sup>3</sup> In accordance with the Scheduling Order, the Committee has been coordinating with the parties regarding a joint informative motion with respect to the monoline insurers' lift stay motion, identifying, among other things, the parties who intend to appear and speak in connection with the motions and the time allocations for each speaker.

*Insurance Company for Relief from the Automatic Stay, or, in the Alternative, Adequate Protection [Case No. 17-3567, Docket No. 808];*

- (iii) *Limited Joinder of Official Committee of Unsecured Creditors in Support of Financial Oversight and Management Board's Response to DRA Parties' Opening Response to (I) Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company for Relief From the Automatic Stay, or, in Alternative, Adequate Protection [Dkt. No. 10102], and (II) Opposition of Financial Oversight and Management Board for Puerto Rico to Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company for Relief from the Automatic Stay, or, in Alternative, Adequate Protection [Dkt. No. 10613] [Case No. 17-3567, Docket No. 750];*

- (c) *Ambac Assurance Corporation, Financial Guaranty Insurance Company, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and the Bank of New York Mellon's Motion Concerning Application of the Automatic Stay to the Revenues Securing the CCDA Bonds. [Case No. 17-3283, Docket No. 10104];*

- (i) *Partial Joinder of Official Committee of Unsecured Creditors in Support of Opposition of Commonwealth of Puerto Rico to Motion of Ambac Assurance Corporation, Financial Guaranty Insurance Company, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and the Bank of New*

*York Mellon Concerning Application of Automatic Stay [ECF No. 10104]*

*[Case No. 17-3283, Docket No. 10636];*

(ii) *Limited Joinder of Official Committee of Unsecured Creditors in Support of Sur-Reply of the Commonwealth of Puerto Rico in Opposition to Motion of Ambac Assurance Corporation, Financial Guaranty Insurance Company, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and the Bank of New York Mellon Concerning Application of Automatic Stay [ECF No. 10104] [Case No. 17-3283, Docket No. 13168];*

(d) *Amended Motion of Ambac Assurance Corporation, Financial Guaranty Insurance Company, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and U.S. Bank Trust National Association, Concerning Application of the Automatic Stay to the Revenues Securing the PRIFA Rum Tax Bonds. [Case No. 17-3283, Docket No. 10602];*

(i) *Partial Joinder of Official Committee of Unsecured Creditors in Support of Supplemental Opposition of Commonwealth of Puerto Rico to Amended PRIFA Bondholder Motion to Lift Automatic Stay [ECF No. 10602] [Case No. 17-3283, Docket No. 10635];*

(ii) *Limited Joinder of Official Committee of Unsecured Creditors in Support of Sur-Reply of Commonwealth of Puerto Rico in Opposition to Amended PRIFA Bondholder Motion to Lift Automatic Stay [ECF No. 10602] [Case No. 17-3283, Docket No. 13171];*

(e) *Motion of Atlantic Medical Center, Inc., Camuy Health Services, Inc., Centro de Salud Familiar Dr. Julio Palmieri Ferri, Inc., Ciales Primary Health Care*

*Services, Inc., Corp. de Serv. Médicos Primarios y Prevención de Hatillo, Inc., Costa Salud, Inc., Centro de Salud de Lares, Inc., Centro de Servicios Primarios de Salud de Patillas, Inc., and Hospital General Castañer, Inc. Seeking (I) Enforcement of the Court's Prior Order and (II) Relief from the Automatic Stay. [Case No. 17-3283; Docket No. 12918];*<sup>4</sup>

(i) *Official Committee of Unsecured Creditors' Statement in Partial Support of Motion of Atlantic Medical Center, Inc. and Other Health Service Providers for (I) Enforcement of Court's Prior Order and (II) Relief from Automatic Stay [Case No. 17-3283; Docket No. 13260];*

(f) Any objections, responses, statements, joinders, or replies to any of the foregoing pleading; and

(g) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

2. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing telephonically.

*[Remainder of page intentionally left blank.]*

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<sup>4</sup> Pursuant to a stipulation [Docket No. 13279], the movants and the Oversight Board have agreed to adjourn the motion.

WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: June 1, 2020

/s/ Luc A. Despins

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- and -

/s/ Juan J. Casillas Ayala

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